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Karen Adams, Project Manager, Regulatory Division  
696 Virginia Rd. 696 Virginia Rd.  
Concord, MA 01742 Concord, MA 01742

**Re: Comments on the Cape Wind Project – DEIS/DEIR**

Dear Ms. Adams:

My name is Sue Tierney. I live in Newton, Massachusetts. I am submitting comments on behalf of myself and my family. I urge you to approve the Draft Environmental Impact Statement for the Cape Wind Project.

I start by stating that I am submitting comments on my own behalf because in my professional career, I have been involved in energy and environmental policy, regulation and consulting for approximately 25 years, most of that here in Massachusetts. I have devoted much of my work to helping others finding economical, environmentally sustainable and reliable means to meet the public's needs for energy. I have done that as a regulator, a policy maker, an educator, a consultant, and a volunteer. But I am submitting comments on the Cape Wind Project DEIR/DEIS in my personal capacity. No one has asked me to do so; no one is paying me – directly or indirectly - to do so.

I am currently a private consultant on issues relating to electric and natural gas industry in this region and around the country. Previously, I served for 13 years in state and federal government on energy and environmental policy issues. I was assistant secretary for policy at the U.S. Department of Energy. In Massachusetts state government, my past jobs included being Secretary of Environmental Affairs, commissioner of the Department of Public Utilities (the predecessor agency of today's Department of Telecommunications and Energy), executive director of the Energy Facilities Siting Council, and senior economist of the Executive Office of Energy Resources. I have served as the chief state officer in administering the Massachusetts Environmental Policy Act. As a state regulator, I have reviewed countless proposals to site power lines and gas pipelines and large power plants and incinerators and highways and buildings and hazardous waste facilities and stadiums and many other types of projects involving public review of public and private infrastructure projects needed to meet society's needs. I have attended countless public hearings in which neighbors of project proposals have come out in the evening hours to comment on the impacts that they expected to see from the siting of projects in their neighborhoods. Some of the projects were located within hundreds of yards of their neighbors. Often these impacts were related to traffic, or noise, or property values, or visual impacts, or impacts on wetlands or wildlife, or some combination of all of the above. I can't think of a single project where there wasn't a clash between public needs and private interests.

On a volunteer basis, I currently serve on the board of directors of many non-profit environmental and energy-related organizations. As a commissioner member of the bipartisan National Commission on Energy Policy, I participated last week in unveiling the results of our three-year effort to break the stalemate on the nation's energy policy. For a year last year, I served as chair of the Ocean Management Task Force, appointed by the current Massachusetts Secretary of Environmental Affairs, and together with the other members of the Task Force recommended the adoption of a framework for sound management of the state's ocean resources. I am currently on the boards of many environmental organizations, including ones in this region, nationally and even in China.

The common theme of my all of volunteer activities on these boards and commissions is to explore ways to have the nation and the region adopt environmentally and economically sustainable energy supplies. In particular, I am especially concerned about the threat of global warming and the contribution of man-made emissions of greenhouse gases from consumption of fossil fuels in cars, in power plants and in industries around the world, here in the US and at home here in New England. The threat of climate change is so important that we all must shake up our own "business as usual" approaches to solving the nation's energy and environmental problems.

Last week, the National Commission on Energy Policy of which I am a member, stated that as a nation, we must find "common ground in rejecting certain persistent myths — on the left and on the right — that have often served to polarize and paralyze the national energy debate. These include, for example, the notion that energy independence can be readily achieved through conservation measures and renewable energy sources alone, or that limiting greenhouse gas emissions is either costless or so costly as to wreck the economy if it were tried at all. Most of all, Commissioners rejected the proposition that uncertainty justifies inaction in the face of significant risks. Given current trends, the consequences of inaction are all too clear. Under business-as-usual assumptions, the United States will consume 43 percent more oil and emit 42 percent more greenhouse gas emissions by 2025.<sup>1</sup> At the global level, oil consumption and emissions will grow 57 and 55 percent respectively over the same timeframe, and the Earth will be heading rapidly — perhaps inexorably — past a doubling and toward a tripling of atmospheric greenhouse gas concentrations. In the Commission's view, this is not a scenario that should inspire complacency, nor is it consistent with the goal of reducing the nation's exposure to potentially serious economic, environmental, and security risks." (National Commission on Energy Policy, "*Ending the Energy Stalemate: A Bipartisan Strategy to Meet American's Energy Challenges*," December 8, 2004.)

And just earlier today, I, along with the other members of the Commonwealth's Ocean Management Task Force, met with Massachusetts' Secretary of Environmental Affairs. I recently chaired that Task Force, whose members unanimously recommended in our Final Report ("*Wave of Change*," March 2004) that the Commonwealth adopt a new ocean resource management framework in order to assure that the state's waters are managed, developed and conserved in ways consistent with the public trust.

In calling for a new ocean management planning approach, our Task Force also made a number of other recommendations, including ones relating to improving our information, enhancing our knowledge of the oceans, improving our coordination with others like the

federal government with who we share ocean boundaries, and so forth. We stated that “The recommendations in this report are prospective in nature and will not impact projects or proposals already under regulatory review. We believe that sound public policy requires that any new laws, regulations, or policies adopted in line with our recommendations be applied prospectively with respect to projects filed after the adoption of these new policies. We neither recommend a moratorium on development and permitting activities, nor want our proposals and uncertainty about policy to have the effect of chilling development.” We were clear in saying that “This report is therefore about planning for our oceans' future. It is not about stopping development or fishing. But it is about charting a course for protection and use of our oceans, rather than simply reacting to trends and developments. While our suggestion for enhanced planning is new, we recognize that Massachusetts has a long history of asserting its position about how offshore resources should be used - whether it be questioning and ultimately halting Georges Bank oil drilling in the 1980s, successfully gaining fishery management jurisdiction for Nantucket Sound, or championing the designation of the Stellwagen Bank National Marine Sanctuary adjacent to state waters in the early 1990s. We have gone to extraordinary lengths in recent years, for example, to reduce and mitigate the impacts on our oceans of our activities on land; the massive, multi-year effort to clean up Boston Harbor is perhaps the best example of this investment in the health of our ocean. Massachusetts has long been culturally, ecologically, and economically invested in the ocean, and our recommendations reflect and honor that tradition.”

One of our other recommendations, in particular, is one that underscores why I am submitting these comments on the Cape Wind Project. The Task Force noted the important interactions between global climate change and the conditions of our ocean resources, and we recommended that the state include in its Climate Change Action Plan various elements relating to effects of climate change on our coasts and oceans, measures to mitigate effects on such things as coastal flooding and sea level rise, and policies to reduce greenhouse gas emissions. We stated our support for policies that decrease the Commonwealth's reliance on energy resources that emit greenhouse gasses. One such policy, of course, is the state's Renewable Portfolio Standard, which calls for increasing levels of new renewable power use by consumers in the state.

It is with that in mind that I am encouraging you to approve the Cape Wind DEIR/DEIS. I have no other dog in this fight. After much thought and review of documents, I have personally come to the conclusion that we need the Cape Wind farm as part of our energy mix.

In fact, seeing this DEIR is what helped me to reach that conclusion. Before seeing the DEIR, I was a fan of wind power, to be sure, but did not know whether I could personally support this project in light of its particular environmental impacts on the specific site and its surrounding areas. At different points in time over the past few years, I considered working for one side or the other in this debate – but decided repeatedly not to. I could not work against a wind project of such potential importance to helping enable Massachusetts to meet its renewable energy targets; and I didn't want to work for such a large wind project in a particular place until knowing that it was acceptable from an environmental point of view. I have watched the debate. I have read various opinions of the courts and regulators. I

spoken on numerous occasions with representatives from the different sides. I have followed the story in the newspaper.

And now, I have reviewed the environmental impact statement. It is thorough. It is detailed. It identifies, analyzes and describes a wide array of impacts with great care, detail and comprehensiveness. Indeed, it is one of the most thorough that I have ever seen. I agree with the Army Corps of Engineer's independent conclusions that this project is needed, and I agree that the project's overall portfolio of environmental and socio-economic impacts is minimal, especially in comparison to the public benefits associated with the production of energy without greenhouse gas emissions.

Moreover, when I consider the impacts of real alternatives to this project – such as burning more fossil fuel in power plants – I think that the impacts are acceptable. Meeting our region's abundant energy needs – that is, the needs for electricity of each and every person and business residing on the Cape and in other communities around the state – requires real energy facilities consuming real fuel and reaping real impacts on neighbors who live substantially closer to those facilities than any one will live near the Wind Farm on Horseshoe Shoal. Of course, some of our electricity needs can come from installing better and more efficient appliances and building more efficient buildings. And while we need much more investment in such, experience tells us that we also need power plants as well. The electricity consumed here on the Cape comes from power plants located near someone's home and in someone's vista. For the most part, those other power plants emit pollutants that contribute to smog, acid rain and soot, which in turn contributes to asthma and other respiratory illnesses, and a variety of ecological impacts. The neighbors of those other plants experience noise, visual, property value and property impacts, as well.

We live in a society in which each of us daily uses the fruits of infrastructure projects – whether roads, or cell towers, or gas pipelines, or transmission lines, or sewage systems – that benefit all of us broadly and distribute particular impacts locally. We also live in a society in which we try to use our public resources wisely for the benefit of the common. In this case, I believe that this Project will produce significant benefits to the commons by providing all of us with a supply of electricity that produces no greenhouse gas emissions. I think this is an important and positive and *public use* of the important wind resources that are located here in Massachusetts, in Nantucket Sound. This is an investment for our children.

I encourage the Army Corps of Engineers and the Massachusetts MEPA office to approve this DEIR/DEIS. It is well done. The project is needed. And I hope that it is approved.

Sincerely,

A handwritten signature in cursive script, reading "Susan Tierney".

Susan Tierney